

Exhibit D

Re: MEF Deps - Third Notice

Sidney Gold <sgold@discrimlaw.net>

Wed 6/17/2020 3:07 PM

To: Shana Washington <shana@dereksmithlaw.com>

Cc: Bill Rieser <brieser@discrimlaw.net>; Walton, David <DWalton@cozen.com>; Benson, Leigh Ann <LBenson@cozen.com>; Seth Carson <seth@dereksmithlaw.com>

i am sorry but my client and I are only available at 4pm on Thursday and we have a hard stop at 6pm

Sent from my iPhone

On Jun 17, 2020, at 12:45 PM, Shana Washington <shana@dereksmithlaw.com> wrote:

Good Afternoon,

Please see the updated third notices of deposition.

Shana Washington

PA Active Notary

Paralegal - Philadelphia

DEREK SMITH LAW GROUP, PLLC

Attorneys at Law

Employment Lawyers Representing Employees Exclusively

Toll Free No. (800) 807-2209

DiscriminationAndSexualHarassmentLawyers.com (website)

Philadelphia Office: 1835 Market Street, Suite 2950, Philadelphia, PA 19103 | (215) 391-4790

Philadelphia Fax: (215) 893-5288

NYC Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760

NJ Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625

Miami Office: 701 Brickell Avenue, Suite 1310, Miami, FL 33131 | (305) 946-1884

email: shana@dereksmithlaw.com

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From: Sidney Gold <sgold@discrimlaw.net>

Sent: Wednesday, June 17, 2020 12:27 PM

To: Shana Washington <shana@dereksmithlaw.com>

Cc: Walton, David <DWalton@cozen.com>; Benson, Leigh Ann <LBenson@cozen.com>; Bill Rieser <brieser@discrimlaw.net>; Seth Carson <seth@dereksmithlaw.com>

Subject: Re: MEF Deps - Third Notice

please move Gregg Roman and Bennett to Thursday

Sent from my iPhone

On Jun 17, 2020, at 12:24 PM, Shana Washington <shana@dereksmithlaw.com> wrote:

Good Afternoon,

Please see attached.

Shana Washington

PA Active Notary

Paralegal - Philadelphia

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From: Shana Washington

Sent: Monday, June 1, 2020 1:07 PM

To: Walton, David <DWalton@cozen.com>; Seth Carson <seth@dereksmithlaw.com>

Cc: Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>;

Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>

Subject: RE: MEF - depos

Good Afternoon,

Please see the attached notices of depositions.

Shana Washington

PA Active Notary

Paralegal - Philadelphia

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From: Walton, David <DWalton@cozen.com>

Sent: Wednesday, May 20, 2020 9:22 PM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Shana Washington <shana@dereksmithlaw.com>; Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>

Subject: Re: MEF - depos

I think Hollin and Levy are available then but please let me verify.

Dave Walton

Sent from my iPhone

On May 20, 2020, at 8:33 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Yes. I can do Bennett on 6/11 and Mark Fink on 6/11. It sounds like I can also do the two Steven Levy and Laurence Hollin on 6/11.

We will notice you for the following:

Daniel Pipes: June 10, 2020 beginning at 10:00 A.M.

Mark Fink: June 11, 2020 beginning at 10:00 A.M.

Mathew Bennett June 11, 2020 beginning at Noon.

Steven Levy June 11, 2020 beginning at 2:00 P.M.

Lawrence Hollin June 11, 2020 beginning at 4:00 P.M.

If you want to do them in another order or if you want to switch days that week, please let me know.

I need to get Greg Roman on the calendar and I would prefer not to do Greg Roman in the same couple day period of time.

Can you please give me a date for Greg Roman for the week of June 1 through June 5, 2020.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

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From: Walton, David <DWalton@cozen.com>

Sent: Wednesday, May 20, 2020 8:08 PM

To: Seth Carson <seth@dereksmithlaw.com>
Cc: Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>
Subject: Re: MEF - depos

Daniel 6-10 and Marc 6-11? Could you do Bennett on 6-11 too?

Dave Walton
Sent from my iPhone

On May 20, 2020, at 6:59 PM, Seth Carson
<seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

I do not know how long I need with Mark but I know I need all day with Daniel Pipes. So no. I do not want to schedule any deps the same day as Daniel Pipes or Greg Roman.

Can you please give me the date for Greg Roman's deposition?

I gave you 10 days in the two week period of June 1 to June 12, 2020.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
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Email: Seth@DerekSmithLaw.com

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sender that you have received this communication in error and then delete it. Thank you.

From: Walton, David <DWalton@cozen.com>
Sent: Tuesday, May 19, 2020 7:41 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Bill Rieser <brieser@discrimlaw.net>; Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>
Subject: MEF - depos

Seth

Please confirm that Ms. Brady will be available for the continuation of her deposition this Friday, May 22. Also, please let us know when Ms. Yonchek is available for the continuation of her deposition. We would like dates for next week.

Daniel Pipes is available on June 11 for his deposition. Would you like to schedule Marc Fink for the same day?

Thank you.

Dave

Dave Walton
Sent from my iPhone

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<3rd Notice of Deposition for ROMAN, FINK, & HOLLIN.pdf>

<3rd Notice of Deposition for PIPES, BENNETT, & LEVY.pdf>

<3rd UPDATED Notice of Deposition for PIPES, FINK, & HOLLIN.pdf>

<3rd UPDATED Notice of Deposition for ROMAN, BENNETT, & LEVY.pdf>